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September 13, 2006

VIA EMAIL: secretary@cftc.gov

Ms. Eileen A. Donovan, Acting Secretary
Secretary of the Commission
Commodity Futures Trading Commission
3 Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

RE: HedgeStreet, Inc. Offers New Member Trading Incentive Program

Dear Acting Secretary Donovan:

Pursuant to Section 5c(c)(1) of the Commodity Exchange Act, as amended ("Act"), and §40.6(a) of the regulations promulgated by the Commodity Futures Trading Commission (the "Commission") under the Act, HedgeStreet, Inc. ("HedgeStreet") hereby submits to the Commission its intent to initiate a New Member Trading Incentive Program (the "Program"). The Program will extend one \$25 gift certificate to any participant that opens an account, funds the account for the first time with a minimum of \$100 and enters at least one (1) trade on the market before the end of the Program Period. The value of the gift certificate will not exceed \$25 in purchases redeemable only on Amazon.com, Inc. The duration of the Program will commence on Friday, September 15, 2006 and will continue through Tuesday, October 31, 2006 (the "Program Period").

The purpose of this letter is to i) notify the Commission of HedgeStreet's intention to initiate the Program at the start of business on Friday, September 15, 2006; and ii) outline the relevant terms and conditions of the Program.

The Program

As a fully electronic, non-intermediated, designated contract market and derivatives clearing organization, HedgeStreet is primarily focused on the retail investor and optimizing his/her trading experience as a HedgeStreet member. HedgeStreet recognizes that by offering special promotions such as the Program regarding its products and services it is providing an education to the general public about the unique instruments available for trading on HedgeStreet.

The terms and conditions that will apply to the Program are as follows:

- All participants of the Program must comply with the existing restrictions and requirements set forth under the HedgeStreet eligibility and application procedures represented by Chapter 3 of the HedgeStreet Rulebook, including, but not limited



to, Chapter 3.1(a)(i) which specifically states that an individual must be “old enough to enter into a legally enforceable contract”;

- This Program will not award gifts of cash value. Rewards for those members participating in the Program will include a \$25 gift certificate (“Gift Certificate”) which will be redeemable only towards purchases made through Amazon.com, Inc.;
- A Participant will become eligible to receive the Gift Certificate once the participant (i) opens an account on HedgeStreet (ii) funds his/her account for the first time, and (iii) executes at least one trade on HedgeStreet at any time during the Program Period;
- A Participant that has already opened an account on HedgeStreet but has not yet funded such account is eligible to participate in the Program;
- The Program will not affect the terms and conditions of the Fee Waiver Program (“Waiver Program”). All terms and conditions of the Waiver Program originally certified with the Commission on January 28, 2005 pursuant to Section 5c(c)(1) of the Act, and §40.6(a) of the regulations promulgated by the Commission under the Act continue to be in full force and effect. HedgeStreet subsequently extended the Waiver Program and certified with the Commission such extension on March 22, 2005, June 29, 2005, September 26, 2005 and on January 5, 2006 at which time HedgeStreet certified that the Waiver Program would be extended until the close of business on December 31, 2006;
- It is the responsibility of each participant to follow the rules of HedgeStreet and the Program, and;
- The Program will expire at the close of business on Tuesday, October 31, 2006.

HedgeStreet hereby certifies that the Promotion complies with the Commodity Exchange Act, as amended, and the Commissions regulations adopted thereunder.

Should you have any questions or require additional information, please do not hesitate to contact the undersigned at (650) 638-3511 or sford@hedgestreet.com.

Sincerely,

Stephanie Ford
Vice President, Legal & Compliance

cc: Clarissa Manansala – HedgeStreet, Inc.